

LONDON & MEAD
ATTORNEYS AT LAW

September 1, 2017

By ECF

The Honorable Joan M. Azrack
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Tibor Klein, et al., Criminal Docket No. 16-442 (JMA)

Dear Judge Azrack:

Defendant Schulman's sentencing memorandum is currently due next Wednesday, September 6. With apologies to the Court, we are still waiting on a few additional letters in support of Mr. Schulman. We respectfully request a two-day extension of the sentencing memo filing date, and government counsel have consented to the following schedule: defendant Schulman's sentencing memo be filed by Friday, September 8, and the government's sentencing memo to be filed to be filed by Friday, September 15. Sentencing is scheduled for September 26.

We also seek guidance from the Court on the logistics for filing personal letters in support of the Defendant. Because those letters contain personal identifying information and discussions of personal matters, we would prefer to provide them to chambers directly, rather than filing them on the public record. We would also like leave to file our sentencing memo under seal on September 8, followed by a redacted version to be filed publicly by Monday, September 11. The government takes no position on sealing.

Thank you.

Respectfully submitted,

/s/
Christopher B. Mead

cc: All Counsel (by ECF)